

**IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WISCONSIN**

<p><b>ULTRATEC, INC. and CAPTEL, INC.,</b></p> <p>Plaintiffs,</p> <p>v.</p> <p><b>SORENSEN COMMUNICATIONS, INC.</b> <b>and CAPTIONCALL, LLC,</b></p> <p>Defendants.</p>	<p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p>	<p>Civil Action No.: 3:14-cv-00066-JDP</p>
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**DEFENDANTS' SORENSON COMMUNICATIONS, INC.**  
**AND CAPTIONCALL, LLC PROPOSED VOIR DIRE QUESTIONS**

Defendants Sorenson Communications, Inc. and CaptionCall, LLC (“Defendants”) respectfully proposes that the jury *venire* be asked the following questions, in addition to those regularly asked by the Court:

1. Have you or someone close to you ever been employed by the government? Please explain.

2. Do you have any opinion of the legal system based on your involvement or the involvement of someone close to you in a lawsuit?

3. You have already answered the court's questions about any familiarity with the parties in this case.

- Do you feel any bias or tendency to favor a company that is based here in Madison?
- Likewise, do you feel any bias or leaning against a company based elsewhere who is being sued by a local company?

- Do you have any lingering concern that you might not be able to set aside your inclination in favor of a local company?

4. I am now going to read to you a list of the individuals who might appear as witnesses in this case. Are you related to, or personally acquainted with, any of those individuals?

5. Have you or someone close to you ever had education, been employed, trained, or had any experience in any of the following areas?

- Law
- Engineering
- Computer Programming or Information Technology
- Telecommunications
- Telephone design
- TDD or Captioned telephone services
- Any field related to providing services or care to those with hearing impairment or loss
- Voice signal processing
- Echo cancellation software

6. Have you or someone close to you ever owned a business? Please explain.

7. Do you regularly read business news or follow technology/computer news?

8. Do you have any knowledge or experience in dealing with the Americans with Disabilities Act (ADA)? Please explain.

9. Do you or someone close to you have hearing loss? Or are you or someone close to you partially or fully deaf? Please explain. Does this person use a device to improve their hearing? Please explain.

10. Have you or someone close to you ever used captioned telephone service or other technology to place or receive a telephone call? Please explain.

11. Have you or someone close to you ever invented something or been involved in the development of a new product or process? Please explain.

12. Have you ever had an idea, creation or invention taken from you or used without your permission?

13. Do you or someone close to you have experience with patents, either personally or for a company you have worked for? Please explain:

- Have you or someone close to you tried to obtain a patent or patents?
- Have you already formed opinions about patents and the patent process?
- Have you or someone close to you been involved in any legal action concerning patents?
- Do any of these experiences with patents impact your ability to be a fair and impartial juror in this case?

14. Do you have any health issue or disability that would make it difficult or impossible for you to serve as a member of the jury in this case?

15. Are you familiar with or heard anything about a dispute between the parties in this case or have you ever been contacted by anyone in connection with a dispute between the parties?

16. Do you know of any other matter which you believe should be called to the court's attention, or which you think may prevent you from rendering a fair and impartial verdict based solely upon the evidence and my instructions as to the law? This is the time for you to give us

any additional information we may have failed to ask about, which you think may bear on your ability to serve as a juror and to fairly and impartially weight the evidence.

Dated: July 20, 2015

Respectfully submitted,

/s/ Bryant C. Boren, Jr.  
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**Attorneys for Defendants and Counter-Plaintiffs  
Sorenson Communications, Inc. and CaptionCall,  
LLC**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on July 20, 2015, a copy of the foregoing pleading was served electronically, via CM/ECF, on all counsel of record who are deemed to have consented to such service under the Court's local rules.

/s/ Harper S. Batts